

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TYRONE J. LLOYD,	)	
	)	
Plaintiff,	)	Case no. 08CV3059 PH
	)	
v.	)	Judge Guzman
	)	Magistrate Judge Cox
FORD MOTOR COMPANY,	)	
	)	
Defendant.	)	

**AGREED-TO MOTION FOR EXTENSION OF TIME TO ANSWER OF OTHERWISE  
RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Ford Motor Company ("Ford"), with the consent of the Plaintiff, Tyrone Lloyd, by through his counsel, hereby moves for an order extending its time to answer or otherwise respond to Plaintiff's Complaint to and including August 14, 2008. In support of this motion Ford states as follows:

1. Ford was served with Plaintiff's Complaint on June 24, 2008, making its responsive pleading due on or before July 14, 2008.
2. Shortly after it had retained counsel, Ford previously requested and received a brief extension of time to and including July 31, 2008 in which to respond to Plaintiffs' Complaint.
3. Ford has been working diligently to investigate the allegations in the Complaint and to formulate its response thereto. However, Plaintiff's Complaint contains 96 fact paragraphs and covers events dating back nearly 10 years. Ford needs additional time to locate documents and witnesses and to gather information that will allow it to fully respond.
4. Ford does not make this request for purposes of delay, but rather in the interest of justice and so that it may prepare an appropriate response to Plaintiff's Complaint.

5. Plaintiff's counsel has been consulted and has no objection to this request.

WHEREFORE, Defendant Ford Motor Company respectfully requests that the Court enter an order extending its time to answer or otherwise respond to Plaintiff's Complaint to and including August 14, 2008 and for whatever other and further relief the court deems just and proper.

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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 8, 2008, the foregoing was filed electronically with the Clerk of the court to be served by operation of the court's electronic filing system upon the following:

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Attorney for Plaintiff

s/ Kurt D. Williams  
Attorney for Defendant Ford Motor Company